

UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

BITCO GENERAL INSURANCE
CORPORATION,

Plaintiff,

v.

UNION RIDGE RANCH, LLC and INLAND
COMPANY,

Defendants.

Case No.: 3:22-cv-05624-BHS

**STIPULATED MOTION AND ORDER
FOR MODIFICATION OF INITIAL
SCHEDULING ORDER AND FOR
EXTENSION OF TIME TO FILE AN
ANSWER**

BITCO General Insurance Corporation ("BITCO General") and Inland Company ("Inland") jointly request that the Court find good cause to: (1) modify the Order Regarding Initial Disclosures, Joint Status Report, Discovery, Depositions and Early Settlement ("Initial Scheduling Order") (Dkt. 4), by extending the initial scheduling deadlines by sixty days, and (2) extend Union Ridge's deadline to file an answer to the Complaint by twenty days to January 4, 2023.

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LAW OFFICES
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On September 28, 2022, the Court entered the Initial Scheduling Deadline setting forth the following initial deadlines:

FRCP 26(f) Conference:	12/13/2022
Initial Disclosures Pursuant to FRCP 26(a)(1):	12/20/2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) ("Joint Status Report"):	12/27/2022

Dkt. 4 at 1.

Due to the pressing issues in other matters, Union Ridge—a principal defendant seeking to collect an underlying judgment against BITCO—has not yet filed an answer to the Complaint or enter an appearance in this matter. For this reason, and due to other pressing issues, the parties have not had an opportunity to confer pursuant to Rule 26(f) or with respect to the Joint Status Report.

The parties jointly request that the Court find good cause under Federal Rule 16(b)(4) to modify the Initial Scheduling Order by 60 days as follows:

Deadline for FRCP 26(f) Conference:	2/13/2023
Initial Disclosures Pursuant to FRCP 26(a)(1):	2/20/2023
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	2/27/2023

In addition, the parties jointly request that the Court find good cause to extend Union Ridge's deadline to file an answer to the Complaint by twenty (20) days to January 4, 2023.

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1 The parties of record agree that this request is not made for the purpose of delay,
2 is in the best interests of each party, and is without prejudice to the parties or the Court.
3 Counsel for BITCO General also contacted counsel for Union Ridge Ranch, LLC who
4 also agrees with this request. Accordingly, the parties hereto jointly stipulate and
5 respectfully move this Court to enter an Order extending the Initial Scheduling Order by
6 60 days and extending Union Ridge's deadline to file an answer to January 4, 2023.

7
8 DATED this 20th day of December, 2022.

9
10 /s/ Maggie Diefenbach

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17 **ATTORNEYS FOR PLAINTIFF BITCO**
18 **GENERAL INSURANCE CORPORATION**

19 /s/ John A. Husmann

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GENERAL INSURANCE CORPORATION

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/s/ Douglas M. Bragg

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**ATTORNEYS FOR DEFENDANT INLAND
COMPANY**

SO ORDERED.

DATED this 21st day of December, 2022



Honorable Benjamin H. Settle
United States District Judge

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STIPULATED MOTION AND ORDER FOR
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